

Exhibit 4

AFFIDAVIT OF BRUCE ROSENZWEIG, M.D.

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

1. I, Bruce Rosenzweig, M.D., am over the age of 18 and fully competent to testify to the matters stated herein.

2. I have personal knowledge of the facts stated herein.

3. My opinion that Ethicon's laser-cut mesh causes certain unique problems that are not associated with the mechanically cut mesh is supported by Ethicon's internal documents and by my clinical experience.

4. While I did testify that I am not sure whether I have ever **implanted** laser-cut mesh, I stopped implanting all mesh slings years ago, due to the problems that mesh slings were causing for my patients. My practice regularly includes the **removal** of mesh slings after patients have experienced complications. Thus, I have removed numerous laser-cut mesh slings after they caused complications.

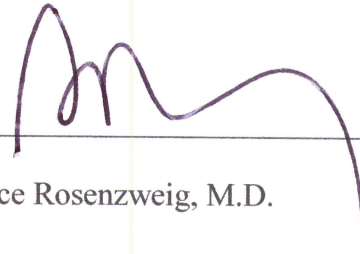
5. While I cannot put a precise number on the laser-cut mesh slings that I have removed, it would be a significant percentage of the more than 300 mesh removal surgeries that I have performed. I have removed several TVT-Abbrevio and TVT-Secur slings, which were all laser-cut. I have also removed a substantial number of TVT and TVT-O slings that were implanted in 2006 or later, and Ethicon's data indicates that approximately 20 percent of Ethicon's TVT and TVT-O slings produced in 2006 or later were laser cut.

6. The primary complication that is unique to laser-cut slings is that it is approximately three times stiffer than the mechanically cut slings. This stiffness makes it more difficult for the surgeon to achieve proper tensioning, leading to such complications as pain,

damage to the urethra, and damage to the bladder. I have seen all of these complications in patients who had laser-cut mesh slings implanted in them.

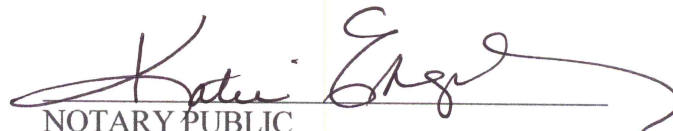
FURTHER, affiant sayeth naught.

In witness whereof, I have affixed my signature this 7th day of October, 2016.



Bruce Rosenzweig, M.D.

Subscribed and sworn to before me, this 7th day of October, 2016.



NOTARY PUBLIC

My Commission Expires:

8/25/17

